

CIVIL COMPLAINT FORM TO BE USED BY A *PRO SE* PRISONER

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

<u>Jeanine Wilkins</u>	<u># 20210000166</u>
Full Name of Plaintiff	Inmate Number
v.	
<u>Gerry Heidle</u>	
Name of Defendant 1	
<u>✓ Riverz</u>	
Name of Defendant 2	
<u>Nurse Holiet</u>	
Name of Defendant 3	
<u>Nurse Christine</u>	
Name of Defendant 4	
<u>PA Catrisse</u>	
Name of Defendant 5	
(Print the names of all defendants. If the names of all defendants do not fit in this space, you may attach additional pages. Do not include addresses in this section.)	
<b>I. NATURE OF COMPLAINT</b>	
Indicate below the federal legal basis for your claim, if known.	
<input checked="" type="checkbox"/> Civil Rights Action under 42 U.S.C. § 1983 (state, county, or municipal defendants)	
<input type="checkbox"/> Civil Rights Action under <u>Bivens v. Six Unknown Federal Narcotics Agents</u> , 403 U.S. 388 (1971) (federal defendants)	
<input type="checkbox"/> Negligence Action under the Federal Tort Claims Act (FTCA), 28 U.S.C. § 1346, against the United States	

FILED  
SCRANTON  
JUN 22 2021

PER \_\_\_\_\_  
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Cafe. PAGE (1)  
Nurse Todd

NAME of Defendant ~~etc.~~

Nurse Mills

NAME of Defendant ~~etc.~~

SGT. Armond

NAME of Defendant ~~etc.~~

**II. ADDRESSES AND INFORMATION**

**A. PLAINTIFF**

wilkins Janine

Name (Last, First, MI)

✓ 20210000166

Inmate Number

MCCF

Place of Confinement

4250 manor DRIVE

Address

Stroudsburg, Monroe, Pennsylvania 18360

City, County, State, Zip Code

Indicate whether you are a prisoner or other confined person as follows:

- Pretrial detainee  
 Civilly committed detainee  
 Immigration detainee  
 Convicted and sentenced state prisoner  
 Convicted and sentenced federal prisoner

**B. DEFENDANT(S)**

Provide the information below for each defendant. Attach additional pages if needed.

Make sure that the defendant(s) listed below are identical to those contained in the caption. If incorrect information is provided, it could result in the delay or prevention of service of the complaint.

Defendant 1:

Haidle Garry

Name (Last, First)

warden

Current Job Title

4250 manor DRIVE

Current Work Address

Stroudsburg, Monroe, PA 18360

City, County, State, Zip Code

Defendant 2:

Riverz

Name (Last, First)

Ch

Current Job Title

4250 MAJOR DRIVE

Current Work Address

Stroudsburg, Monroe, PA, 18360

City, County, State, Zip Code

Defendant 3:

Hailet

Name (Last, First)

Nurse

Current Job Title

4250 MAJOR DRIVE

Current Work Address

Stroudsburg, Monroe, PA 18360

City, County, State, Zip Code

Defendant 4:

Christine

Name (Last, First)

Nurse

Current Job Title

4250 MAJOR DRIVE

Current Work Address

Stroudsburg, Monroe, PA 18360

City, County, State, Zip Code

Defendant 5:

Catrissie

Name (Last, First)

P/A

Current Job Title

4250 MAJOR DRIVE

Current Work Address

Stroudsburg, Monroe, PA, 18360

City, County, State, Zip Code

Cat. B-II

Defendant 6:

Nurse Todd

4250 Manor Drive

Stroudsburg, PA 18360

Defendant 7:

Mills

nurse

4250 Manor Drive

Stroudsburg, PA 18360

Defendant 8:

Armond

Sgt.

4250 Manor Drive

Stroudsburg, PA 18360

### III. STATEMENT OF FACTS

State only the facts of your claim below. Include all the facts you consider important. Attach additional pages if needed.

- A. Describe where and when the events giving rise to your claim(s) arose.

Place of A-unit cell #12  
on or around June 1 2021

- B. On what date did the events giving rise to your claim(s) occur?

Tuesday June 1st

- C. What are the facts underlying your claim(s)? (For example: What happened to you?)

Who did what? All 2021 - ARBORCLTY

On or around June 1st I filed a sick call about a 'large lump on my hip' and I did not get a reply. On the 3rd of June I mentioned to C/S r/serv that my hip was hurting, he called medical and they told him I had to file another sick call. I filed another sick call on Sat June 5th when the nurse Haliel came I complained again and she told me to write another sick call and I wrote another sick call and on June 6th I saw nurse ~~Christine~~ Christine in medical and when she looked at it, I asked what it is she said MRSA - Methicillin Resistant Staphylococcus Aureus (Bacterium) then Christine took a swab and I placed on male intake (reception) quarantine for 2 days, then on June 9th I was placed on B-unit (bed bug) Isolation quarantine. I was given a medication treatment file I would be quarantined for 10 days, this MRSA bump best which I had

puss and blood in my underclothes... I saw Catrisse who is the PA, I never saw a doctor and requested to see a Dr. or taken to the hospital but I was denied... now (Pt)

Catrisse gave up a different diagnosis as I got a big hole in my hip and is trying to cover it up to downgrade it to Step infection when in all reality is MRSA. On June 1st is when I saw Catrisse and I also asked about my return to general pop because it was only supposed to be 10 days. Sixteen, my bed was being held, then my bed on 4 unit was given up to another inmate and Catrisse told me because my wound did not heal I could not go back to Gen. Pop..

On June 15th the medicator stopped while I still have a hole in my hip from MRSA... like been seeking a grievance for over 2 weeks, I am going to medical for wound care every day since June 1st and I am in a total pen. did not come in with MRSA, been confirmed since Feb. 24, 2021, should of never caught MRSA and this complaint was filed. I saw Nurse Wills Weds. June 16th, 17th; Nurse Christine Fri. June 18th, and Sat. June 19th. I saw Nurse Tadd. Today I still have a big hole in my (Right Hip) and I should of never caught MRSA in this facility... And as of this day Sgt. Armond and MCCF has a practice of not submitting grievances so one can redress a grievable cognizable non.

Pivotal claims. And all this is messing with my mind psychologically because (am being punished) (150) for catching a bacteria infection due to the uncleanliness, unsanitary, giving used clothes sheets, Underclothes upon commitment and overcrowding of this facility, and has failed to inspect on

prevention of infectious diseases and are transmitting diseases by failing to thoroughly clean this jail or before an inmate move in the cell... I asked Nurse Todd to take a picture of my wound and I was denied stating: (it has to come from doctor) but as of this day I have yet to see a Dr or an disease infection specialist and wonder if the condoning and allowing inmates to receive filthy, soiled, dirty t-shirts, underwear, socks sheets, and mattresses (makes you question with all the officials what the money for new inmate worksheets, cloths, sheets)? just they keep giving us their (used) dirty clothing / sheets that is transmitting infectious diseases... defendants failed to protect me from this disease causing me to have a deep, open, hole in my leg that's painful. Sgt. Armond still refuses to submit to me a grievance after numerous request

#### IV. LEGAL CLAIM(S)

You are not required to make legal argument or cite any cases or statutes. However, state what constitutional rights, statutes, or laws you believe were violated by the above actions. If you intend to assert multiple claims, number and set forth each claim in separate paragraphs. Attach additional pages if needed.

The defendants (All) has acted undercolor of state law, of a pretrial detainee, acted with deliberate indifference to my medical needs, failed to protect causing me sever mental and physical pain invoking the 8th Amendment of the U.S. Constitution - cruel and unusual punishment. cutting down of medical care and failure to protect...

#### V. INJURY

Describe with specificity what injury, harm, or damages you suffered because of the events described above.

a deep ,open, painful wound on my right hip ; pain and suffering; and mental anguish caused by defendants

#### VI. RELIEF

State exactly what you want the court to do for you. For example, you may be seeking money damages, you may want the court to order a defendant to do something or stop doing something, or you may be seeking both types of relief. If you are seeking monetary relief, state your request generally. Do not request a specific amount of money.

(1) for defendants to pay cost and fees associated with this case; (2) I seek money damages in the amount of \$10,000 compensatory and \$10,000 in punitive damages; (3) order defendants to throw away all the info from each defendant

Date 06/22/21 RELEASE

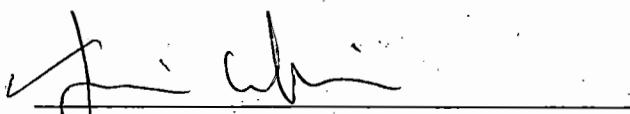
used clothes (undershirts, t-shirts, underwear, Sleep  
and mattresses) that are open growing bacteria  
when we is to get ~~new~~ everything up to committee  
especially with covid-19 and other infection  
disease spreading throughout this facility.. (4)  
declare that defendants acted with deliberate  
indifference to my medical needs (claims)  
involving 8th Amendment / denial of adequate  
medical care and those actions is unconstitutional.

- (5) I seek compensatory, and punitive damages against  
each defendant for 8th Amendment violations. (6)  
order SGT Arnone to immediately submit  
grievances he refuses to submit after numerous  
request/weeks for him to submit, or this matter  
is thoroughly exhausted with MCF because  
they have a policy of not submitting grievances  
so inmates can't have cognizable non-prisoners  
claims. (7) for defendants to immediately take up  
to the hospital to see a disease (infection)  
specialist and for this facility to follow the Dr.  
Orders of treatment.

**VII. SIGNATURE**

By signing this complaint, you represent to the court that the facts alleged are true to the best of your knowledge and are supported by evidence, that those facts show a violation of law, and that you are not filing this complaint to harass another person or for any other improper purpose.

Local Rule of Court 83.18 requires *pro se* plaintiffs to keep the court informed of their current address. If your address changes while your lawsuit is being litigated, you must immediately inform the court of the change in writing. By signing and submitting the complaint form, you agree to provide the Clerk's Office with any changes to your address where case-related papers may be served, and you acknowledge that your failure to keep a current address on file with the Clerk's Office may result in dismissal of your case.



Signature of Plaintiff

6.20.21

Date

Methicillin-Resistant Staphylococcus Aureus:  
(MRSA)

IS several variation of bacterium I caught  
 MCC resulting in infection, a lump that  
 burst resulting in a big painful hole on my  
 right hip to my body by either through  
 direct contact with infected individuals or  
 through direct contact with material that  
 have been exposed to the bacteria (i.e. used  
 clothes given upon placement of MCC (socks,  
 towels, t-shirt, underclothes, sheets) sharing these same  
 clothes with infected inmates (because we are  
 not given ~~new~~ new clothes, all used) and MCC  
 has an illegal practice of superspreading infectious  
 diseases. MCC has an illegal practice of not  
 thoroughly cleaning cells before placement in the  
 cell or allowing one to clean mattresses, and  
 some mattresses are repeat open, water seaks it,  
 bacteria builds, and not thoroughly cleaning  
 the unit (Phones, chairs, remotes, door handles,  
 showers, railings) resulting in unsanitary  
 conditions and with the overcrowdedness (we  
 exposed to MRSA, not thoroughly treated to  
 my serious medical needs citing 8th Amend.  
 deliberate indifference / failure to protest).

Exposure to MRSA is a serious medical need  
 Lopez v. MCCRATH, 2007 WL 1577818, \*5 (N.D. CAL.  
 May 31, 2007)

Also see case that Kuchel v. County of Bucks,  
 455 F.3d 418, 421 (3d. Cir. 2006); Bauer v. City  
 of Philadelphia, 2007 WL 219651, \*5 (E.D. Pa.  
 Jan. 25, 2007)

← over:

1.

Facility (PCCF), the officials failed to notify of MRSA outbreaks, and the gross inadequate medical treatment, failure to keep the blocks, showers, coils cleaned and sanitizing condition of not throwing out old soiled open mats (that's building bacteria), giving us used and soiled/dirty clothing and haven't given out new clothes since 1994 (And unless we queued while HADGE AND THIS Facility doing with tons many sick diseases which THESE USED SOILED ALREADY COATS/COVERS...) and failure to instruct inmates on prevention of infections diseases (as there's also a covid-19 outbreak in this facility) and this deliberate indifference to the risk of transmitting the disease in this facility from one to another I was infected and state an ER Amend claim and the evidence will reflect how I caught MRSA and the pain, suffering, and mental anguish of now medical went to downplay the original diagnosis..

Cuoco v. Moritsugu, 222 F.3d 99, 106-07

2d Cir. 2000 - holding that pretrial detainees' medical care claims invoke the 8th Amendment deliberate indifference

- adequate and accurate record keeping is critical and absent or deficient records create 'the possibility of disaster.'

- destruction or tampering with medical records unconstitutional

- this jail and prison officials have an obligation to protect prisoners from the risk of infections diseases (and did not protect me because I caught MRSA they trying to downplay as a staph infection but this jail is so dirty and the fail to medically screen inmates here (not even know why so many diseases are spreaded..))

- I was contagious allegedly by placing me house alone/rec alone, if it was just a staph infection it would not warranted quarantining.. Now you downplay it from MRSA to Staph infection so I was treated wrongly your saying...? It's still STAPHYLOCOCCUS AUREUS BACTERIUM I caught here, because I did not come in this jail with it So you failed to protect me from catching this bacteria the evidence is clear..

- they are failing to submit a grievance because you got a claim w/ preliminary injunction for this

throw

Place to throw away all these old so used clothes and provide all new shit (sheets, socks, underclothes, towels etc...)

+ tell medical (by request) you want a photo of your Staphylococcus aureus bacterium you caught on your body; and write down everybody name involved including Pt, nurses, dr. etc. citing gross inadequate treatment, failure to protect and 8th Amendment deliberate indifference claims. Pain and suffering and mental anguish by punishing you, not putting you back on the unit by giving me bed up in this overcrowded jail; now resulting in malpractice because I'm wrongly diagnosed and can prove it.. which required an expert analysis

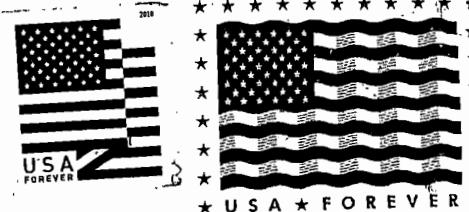
- Need to take photos of Steph (SAFTHC) by request slip...

you got a claim bro...

pursue it...

- Monday have pink request have go cell set Armond about grievances request (twice) 2 times..

Jamaine Wilkins # 20210000168  
NCCF  
4250 Manor Drive MCCF  
Stroudsburg Pa 18360



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JUN 22 2021

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Middle District of PA  
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Scranton PA 18501 - 1148